

# **Exhibit 22**

**In The Matter Of:**

*NEONODE SMARTPHONE LLC, v.  
SAMSUNG ELECTRONICS CO. LTD. Et Al*

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*MAGNUS GOERTZ*

*June 2, 2022*

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*Original File witness Magnus Goertz - June 2\_2022 Thursday (1).txt*

*Min-U-Script® with Word Index*

## 1 UNITED STATES DISTRICT COURT

## 2 WESTERN DISTRICT OF TEXAS

## 3 WACO DIVISION

4 NEONODE SMARTPHONE LLC, )

5 Plaintiff,) )

6 Civil Action No.  
7 6:20-cv-00507

8 v. )

9 SAMSUNG ELECTRONICS CO. LTD. )  
10 and SAMSUNG ELECTRONICS )  
11 AMERICA, INC., )

12 Defendants.) )

13 NEONODE SMARTPHONE LLC, )

14 Plaintiff,) )

15 Civil Action No.  
16 6:20-cv-00505

17 v. )

18 APPLE INC., )  
19 Defendant.) )

## 20 DEPOSITION OF

## 21 MAGNUS GOERTZ

22 Thursday, June 2, 2022

23 at 9:26 a.m.

24 Reported by:  
25 SHERRY YAN,  
RPR, California CSR No. 14442  
Job No. 5183794www.european-depositions.com  
+442073850077GOOGLE EXHIBIT 1044  
GOOGLE v. NEONODE  
IPR2021-01041

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1 touch and glide motion?

2 A. I think it could be read from the patent and  
3 what was exactly invented by the time this document was  
4 written. I have a hard time to remember.

5 Q. As we sit here today, do you recall what  
6 functionality is represented by the fingerprint and the  
7 up arrow and the left arrow?

8 A. It's typical. If you look at the patents, you  
9 have the file icon, where you put your finger and then  
10 drag it up, but that's fixed on the printed on the  
11 phone. For the keyboard, you put the finger on the  
12 keyboard and slide it up.

13 Q. So those are touch and glide movements on the  
14 display to open an application?

15 A. Yes.

16 Q. So that functionality is something that you  
17 were already thinking about at the time you created  
18 Exhibit 7?

19 MS. CHEN: Objection. Leading.

20 THE WITNESS: I would've set a date, but I  
21 cannot remember which date I invented the different  
22 parts on that.

23 Q. BY MR. GRAVES: I am not asking you for a  
24 specific date, but I'm trying to relate those file  
25 manager and keyboard functionalities you've just

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1 CERTIFICATE OF COURT REPORTER.

2

3 I, Sherry Yan (California CSR 14442,

4 Registered Professional Reporter, Member of the National

5 Court Reporters Association,) do hereby certify that

6 MAGNUS GOERTZ was duly sworn/affirmed by Judge Hedenmo,

7 that I took the stenograph notes of the foregoing

8 statement under oath/affirmation and that the transcript

9 thereof is a true and accurate record transcribed to the

10 best of my skill and ability.

11 I further certify that I am

12 neither counsel for, related to, nor employed by any of

13 the parties to the action in which the deposition was

14 taken, and that I am not a relative or employee of any

15 attorney or counsel employed by the parties hereto, nor

16 financially or otherwise interested in the outcome of

17 the action.

18 

19 Signed .....

20 Sherry Yan

21 Date: Tuesday, June 7, 2022

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